

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

IN RE:)	
TRYPHENA F. BLAKE &)	
STEADMAN L. BLAKE)	CHAPTER 11
Debtors)	CASE NO. 07-12445
)	

DEBTORS' COUNSEL RESPONSE TO SHOW CAUSER ORDER

Now comes Timothy M. Mauser, Counsel (hereinafter "Counsel") to Tryphena F. Blake and Steadman L. Blake (hereinafter, the "Debtors") to respond to the Court's Order to Show Cause dated March 13, 2009 as to why this Case should not be converted to one under Chapter 7 for failure to file an Amended Disclosure Statement and Plan by March 10, 2009 as per Court Order.

1. As Counsel to the Debtors I take full responsibility for failure to file the Third Amended Disclosure Statement and Plan in the time allowed by the Court. Having obtained an extension to file the Amended Disclosure Statement, I failed to take the necessary steps to ensure that the property valuations which are the basis of the Third Amended Plan were obtained on a timely basis, further I failed to obtain updated financial information from the Debtors to allow a timely response.

2. The Debtors provided the requested information, timely upon my request, however I then experienced additional difficulties accessing the original documents prepared for the prior disclosure statements which required significant time to reissue. As a result the filing of the Third Amended Disclosure Statement and Plan was inappropriately delayed.

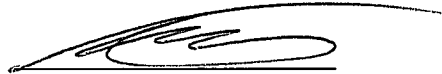
3. Counsel has this day filed a Third Amended Disclosure Statement and Plan with accompanying exhibits. The Third Amended Disclosure Statement presents a feasible Chapter 11 Plan of Reorganization and provides a significant dividend to unsecured and under-secured creditors. The Third Amended Disclosure Statement addresses the objections of the Office of the U. S. Trustees to the Second Disclosure Statement and Plan, in that the Third Amended Plan is based upon updated property valuations whose resultant mortgage payments at 5% fix rates, allow the Debtors to meet the carrying costs of their properties and provide significant Plan payments to unsecured and under-secured creditors.

4. Counsel believes that the Third Amended Plan will be approved in that the Second Amended Plan did have a consenting impaired class, Class XIII unsecured, who will likely approve the Debtors Third Amended Plan of Reorganization.

5. As the Debtors are blameless with respect to the delay in filing the Third Amended Disclosure Statement, and given that the Third Amended Disclosure Statement and Plan of Reorganization presents a feasible plan of reorganization which is likely to be approved by the Court, Counsel to the Debtors respectfully requests that this Honorable Court excuse the Debtors for my failure to file the Third Amended Plan in a timely manner, and permit the Third Amended Disclosure Statement and Plan of Reorganization to be considered upon its merits. and further, that this Case not be converted to one under Chapter 7.

Respectfully Submitted
On Behalf of
Steadman Blake and
Tryphena Blake

by their attorney,



Timothy M. Mauser
Mauser & Mauser
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Boston, MA 02214
Tel: (617) 338-9080
Fax: (617) 720-5553
BBO #542050

Dated: March 25, 2009
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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
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CERTIFICATE OF SERVICE

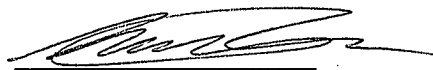
I, Timothy M. Mauser, do hereby certify that I have this day served a copy of the enclosed Debtors' Counsel Response to Show Cause Order upon the following parties in interest to said action as follows:

By ECF:

Eric K. Bradford on behalf of United States Trustee
John Fitzgerald, United States Trustee
Deirdre M. Keady on behalf of GMAC Mortgage LLC
Joseph G. LaRusso on behalf of City of Boston Treasury Department
Victor Manougian on behalf of Deutsche Bank National Trust Company, as Trustee for the Certificate Holders of Carrington Mortgage Loan Trust
Richard T. Mulligan on behalf of Home Loan Services, Inc
Meghan Elizabeth Roche on behalf of Deutsche Bank Trust Company Americas

By Regular Mail:

Tryphena and Steadman Blake
121 Woodrow Avenue Apt. 2
Dorchester, MA 02124



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Dated: March 25, 2009
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